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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 UNITED STATES OF AMERICA,	)	No. CR-10-0550 & 14-0154 RS
	)	
13 Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del>
	)	ORDER TO CONTINUE
14 v.	)	
	)	
15 LEEVERETT HALL,	)	
	)	
16 Defendant.	)	
	)	

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1 The parties jointly request that, subject to the Court's approval, the hearing presently set  
2 for September 30, 2014 be continued to October 21, 2014 at 2:30 pm.

3 At the last appearance, the Court set both of the above-captioned matters over until  
4 September 30, 2014 for further status and/or change of plea. Government counsel is still in a  
5 lengthy trial. Because of that trial, government counsel just provided defense counsel with a  
6 proposed plea agreement on Friday, and defense counsel now needs time to review that with her  
7 client to determine how best to proceed. Government counsel is unavailable on October 7 and  
8 defense counsel is unavailable on October 14; accordingly, the parties are requesting a  
9 continuance to October 21, 2014.

10 For the above reasons, the parties stipulate there is good cause – taking into account the  
11 public interest in the prompt disposition of this case – to exclude the time from September 30,  
12 2014 to October 21, 2014 from computation under the Speedy Trial Act, and that failing to  
13 exclude that time would unreasonably deny the defendant and his counsel the reasonable time  
14 necessary for effective preparation of counsel and continuity of counsel, taking into account the  
15 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that  
16 the ends of justice would be served by excluding the time from September 30, 2014 to October  
17 21, 2014 from computation under the Speedy Trial Act and that the need for the exclusion  
18 outweighs the best interests of the public and the defendant in a speedy trial.

19 IT IS SO STIPULATED.

20  
21 9/29/14  
22 DATED \_\_\_\_\_

\_\_\_\_\_  
/s/  
BENJAMIN P. TOLKOFF  
Assistant United States Attorney

23  
24 9/29/14  
25 DATED \_\_\_\_\_

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/s/  
JODI LINKER  
Assistant Federal Public Defender

26 IT IS SO ORDERED.

27 9/29/14  
28 DATED \_\_\_\_\_

  
\_\_\_\_\_  
RICHARD SEEBORG  
United States District Judge